The Applicants respectfully request reconsideration in view of the following remarks and amendments. Claims 42 and 50-53 are amended. Therefore, claims 42-56 remain pending in the application.

I.   **Objections to the Specification**

The Examiner raised objections to the Specification for the following reasons:

> The specification is objected to as failing to provide proper antecedent basis for the claimed subject matter. See 37 CFR 1.75(d)(l) and MPEP 5 608.01(0). Correction of the following is required: "computer-readable medium" of claims 50-53 should be "computer-readable storage medium" to correlate with the subject matter disclosed in paragraph 0072 of the specification.

In response to the Examiner's comments, the Applicants have amended claims 50-53 to change the phrase "computer-readable medium" to state "computer-readable storage medium" as suggested by the Examiner. In view of the amendments, the Applicants believe that claims 50-53 have proper antecedent basis support in the Specification. Accordingly, reconsideration and withdrawal of the objections to claims 50-53 are respectfully requested.

II.   **Claims Rejected Under 35 U.S.C. § 102**

Claims 42-44, 48, 50, 51, and 53-56 stand rejected under 35 U.S.C. § 102(b) as being anticipated by US Patent No. 6,081,890 issued to Datta (hereinafter "Datta"). The Examiner must show that the cited reference teaches each element of a claim to establish an anticipation rejection under § 102.

Claim 42, as amended, recites the elements of "each of the earlier of the two firmware modules firmware module including an interface to call the function contained in the third firmware module." Support for the amendments may be found, for example, on page 11, lines 22-27 and Fig. 6 of the Specification. Datta fails to teach these elements. Datta deals with a bootstrapping procedure to initialize components and resources within a computer system. See Datta, column 1, lines 25-27. As explained in Datta, a means for supporting legacy resources is

provided though a hybrid firmware system that includes first and second modules for legacy and native platforms, respectively. See Datta, column 3, lines 38-44. However, the Examiner has failed to point to the section of Datta that discloses the elements of "each of the earlier of the two firmware modules firmware module including an interface to call the function contained in the third firmware module," as recited in claim 42. Instead, as shown in Fig. 2 of Datta, data structure 230 (that includes pointers to respective dispatchers and return addresses of firmware 204 and 208) is located in firmware 204, but firmware 208 fails to include a corresponding structure for calling a function in a third firmware module. Moreover, the Examiner has not cited the portion of Datta that discloses the element of "a third firmware module" as recited in claim 42. Consequently, Datta fails to teach the elements of "each of the earlier of the two firmware modules firmware module including an interface to call the function contained in the third firmware module," as recited in claim 42. Thus, in view of at least the foregoing reasons, Datta fails to teach each element of claim 42. In addition, claims 43, 44, and 48 are patentable over Datta because each of these claims depends on claim 42. Accordingly, reconsideration and withdrawal of the rejection of claims 42-44 and 48 are respectfully requested.

Claim 50, among other limitations, recites the elements of "determining dependencies among a plurality of firmware modules by a separate core module based on information about services imported *in an import table of each of the firmware modules* and services exported *in an export table of each of the firmware modules* before dispatching the plurality of firmware modules by the separate core module, and the services imported *in the import table of each firmware module* of the plurality of firmware modules . . . are provided in another firmware of the plurality of firmware modules" (emphasis added). Support for the amendments may be found, for example, on page 10, lines 12-18 of the Specification. The Examiner has failed to point to the section of Datta that discloses the above elements. Instead, Datta discloses a that each firmware module (e.g., firmware 204 and 208) includes a respective set of pointers (e.g., pointers 242 and 272) that references routines *within the respective firmware* instead of being "provided in another firmware of the plurality of firmware modules," as recited in claim 50. See Datta, column 3, lines 60-67; column 4, lines 53-55. Thus, Datta fails to teach the elements of "determining dependencies among a plurality of firmware modules by a separate core module based on information about services imported in an import table of each of the firmware modules and services exported in an export table of each of the firmware modules before dispatching the

plurality of firmware modules by the separate core module, and the services imported in the import table of each firmware module of the plurality of firmware modules . . . are provided in another firmware of the plurality of firmware modules," as recited in claim 50. Consequently, in view of at least the foregoing reasons, <u>Datta</u> fails to teach each element of claim 50. In addition, claims 51 and 53 are patentable over <u>Datta</u> because each of these claims depends on claim 50. Accordingly, the Applicants respectfully request reconsideration and withdrawal of the rejection of claims 50, 51, and 53.

In regard to claim 54, this claim recites the elements of "one of the two firmware modules is to initialize a hardware component that is not present in the system by iterating through each of the plurality of firmware modules within the BIOS to determine whether the hardware component is present, *each of the plurality of firmware modules including a daisy chain flag corresponding to the hardware component in an import table*" (emphasis added). Support for the amendments may be found, for example, in page 16, lines 6-12 of the Specification. The Examiner has failed to cite and the Applicants are unable to discern the section of <u>Datta</u> that discloses the above elements. As a result, for at least the preceding reasons, <u>Datta</u> fails to teach each element of claim 54.

Thus, in view of at least the foregoing reasons, <u>Datta</u> fails to teach each element of claim 54. Accordingly, the Applicants respectfully request reconsideration and withdrawal of the rejection of claim 54. In addition, dependent claims 55 and 56 are patentable over <u>Datta</u> because of each of these claims depends on claim 54. Therefore, for at least these reasons, <u>Datta</u> fails to teach each element of claims 54-56. Accordingly, the Applicants respectfully request reconsideration and withdrawal of the rejection of claims 54-56.

In regard to claims 45-47, these claims depend from claim 42 and incorporate the limitations thereof. Therefore, for at least the reasons mentioned in connection with claim 42, <u>Datta</u> fails to teach each element of claims 45-47. Accordingly, the Applicants respectfully request reconsideration and withdrawal of the rejection of claims 45-47.

In regard to claim 52, this claim depends from claim 50 and incorporates the limitations thereof. Therefore, for at least the reasons mentioned in connection with claim 50, <u>Datta</u> fails to teach each element of claim 52. Therefore, for at least these reasons, <u>Datta</u> fails to teach each

element of claim 52. Accordingly, the Applicants respectfully request reconsideration and withdrawal of the rejection of claim 52.

In regard to claim 49, this claim depends from claim 42 and incorporates the limitations thereof. Therefore, for at least the reasons mentioned in connection with claim 42, <u>Datta</u> fails to teach each element of claim 49. Therefore, for at least these reasons <u>Datta</u> fails to teach each element of claim 49. Accordingly, the Applicants respectfully request reconsideration and withdrawal of the rejection of claim 49.

CONCLUSION

In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the prior art of record and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes that a telephone conference would be useful in moving the application forward to allowance, the Examiner is encouraged to contact the undersigned at (310) 500-4787.

Respectfully submitted,

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Dated:____April 4, 2008____

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Melissa Stead   4-4 , 2008